

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

RECEIVED
SEP 10 3 47 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

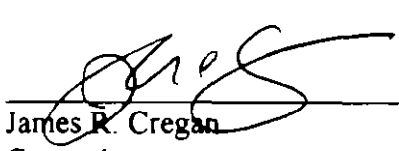
DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
TO USPS WITNESS DEGEN
(MPA/USPS-T12-8-10)**

(September 10, 1997)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS witness Degen (MPA/USPS-T12-8-10).

Respectfully submitted,



James R. Cregan
Counsel
Magazine Publishers of America
Suite 610
1211 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 296-7277

**INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS DEGEN**

MPA/USPS-T12-8. Please refer to Fiscal Year 1996 Cost Segments and Components and Base Year 1996 Cost Segments and Components.

- a. Please confirm that, according to the Fiscal Year 1996 Cost Segments and Components, Mail Processing Direct Labor and Overhead costs (C/S 3.1) were \$12.45 billion, Window Service costs (C/S 3.2) were \$2.0 billion, and Administrative and Support costs (C/S 3.3) were \$2.0 billion.
- b. Please confirm that, according to the Base Year 1996 Cost Segments and Components, Mail Processing Direct Labor and Overhead costs (C/S 3.1) were \$13.25 billion, Window Service costs (C/S 3.2) were \$1.9 billion, and Administrative and Support costs (C/S 3.3) were \$1.3 billion.
- c. Please confirm that the increase in Mail Processing costs (C/S 3.1) from Fiscal Year 1996 to Base Year 1996 was due to assigning costs to components using MODS data, rather than IOCS Questions 18 and 19, for MODS facilities.
- d. By activity code, please disaggregate the costs that were classified as Window Service costs and Administrative and Support costs in Fiscal Year 1996 Cost Segments and Components, but classified as Mail Processing costs in Base Year 1996 Cost Segments and Components. Please provide this information in a spreadsheet format.
- e. By the Class and Subclass to which these costs were distributed, please disaggregate the costs that were classified as Window Service costs and Administrative and Support costs in Fiscal Year 1996 Cost Segments and Components, but classified as Mail Processing costs in Base Year 1996 Cost Segments and Components. Please provide this information in a spreadsheet format.

MPA/USPS-T12-9. Please refer to page 3, lines 7-8 (and footnote 3) of your testimony. In a spreadsheet format, please provide FY 1996 unweighted tally counts and weighted tally dollars for items disaggregated by: (1) item type; (2) tally type (e.g., identical/top piece rule, counted, uncounted); and (3) cost pool. For a list of item types and container types, please refer to the "handling" variable in LR-H-218, SAS log file corresponding to the SAS program "MOD1DIR", Lines 603-628.

MPA/USPS-T12-10. Please refer to page 3, lines 7-8 (and footnote 3) of your testimony. In a spreadsheet format, please provide FY 1996 unweighted tally counts and weighted tally dollars for items disaggregated by: (1) container type; (2) tally type (identical, identified, and unidentified); and (3) cost pool. For a list of item types and container types, please refer to the "handling" variable in LR-H-218, SAS log file corresponding to the SAS program "MOD1DIR", Lines 603-628.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



James R. Cregan

Washington, D.C.
September 10, 1997